

576874

USCG 04-17511-3

PAPERWORK REDUCTION ACT SUBMISSION

Please read the instructions before completing this form. For additional forms or assistance in completing this form, contact your agency's Paperwork Clearance Officer. Send two copies of this form, the collection instrument to be reviewed, the Supporting Statement, and any additional documentation to: Office of Information and Regulatory Affairs, Office of Management and Budget, Docket Library, Room 10102, 725 17th Street NW Washington, DC 20503.

1. Agency/Subagency originating request Dept. of Homeland Security/US Coast Guard		2. OMB control number a. <u>1 6 2 5 - 0 0 3 0</u> b. None	
3. Type of information collection (check one) a. New collection b. Revision of a currently approved collection c. <input checked="" type="checkbox"/> Extension of a currently approved collection d. Reinstatement, without change, of a previously approved collection for which approval has expired e. Reinstatement, with change, of a previously approved collection for which approval has expired f. Existing collection in use without an OMB control number For b-f, note item A2 of Supporting Statement instructions		4. Type of review requested (check one) a. <input checked="" type="checkbox"/> Regular submission b. Emergency - Approval requested by: ___/___/___ c. Delegated 5. Small entities. Will this information collection have a significant economic impact on a substantial number of small entities? Yes <input checked="" type="checkbox"/> No	
7. Title Oil and Hazardous Materials Transfer Procedures		6. Requested expiration date a. <input checked="" type="checkbox"/> Three years from approval date b. Other Specify: ___/___	
8. Agency form number(s) (if applicable) n/a			
9. Keywords Hazardous material, Oil, Pollution prevention, Transfer procedure, Vessel			
10. Abstract The collection of information requires vessels with a cargo capacity of 250 barrels or more of oil or hazardous materials to develop and maintain transfer procedures. Transfer procedures provide basic safety information for operating transfer systems with the goal of pollution prevention.			
11. Affected public (Mark primary with "P" and all others that apply with "X") a. ___ Individuals or households d. ___ Farms b. <u>P</u> Business or other for-profit e. ___ Federal Government c. ___ Not-for-profit institutions f. ___ State, Local or Tribal Gov't		12. Obligation to respond (Mark primary with "P" and all others that apply with "X") a. Voluntary b. Required to obtain or retain benefits c. <input checked="" type="checkbox"/> Mandatory	
13. Annual reporting and recordkeeping hour burden a. Number of respondents <u>178</u> b. Total annual responses <u>178</u> 1. Percentage of these responses collected electronically <u>0</u> % c. Total annual hours requested <u>89</u> d. Current OMB inventory <u>106</u> e. Difference <u>- 17</u> f. Explanation of difference 1. Program change 2. Adjustment <u>- 17</u>		14. Annual reporting and recordkeeping cost burden (in thousands of dollars) a. Total annualized capital/startup costs b. Total annual costs (O&M) c. Total annualized cost requested d. Current OMB inventory e. Difference f. Explanation of difference 1. Program change 2. Adjustment	
15. Purpose of information collection (Mark primary with "P" and all others that apply with "X") a. ___ Application for benefits e. ___ Program planning or management b. <input checked="" type="checkbox"/> Program evaluation f. ___ Research c. ___ General purpose statistics d. ___ Audit g. <u>P</u> Regulatory or compliance		16. Frequency of recordkeeping or reporting (check all that apply) a. <input checked="" type="checkbox"/> Recordkeeping b. Third party disclosure c. <input checked="" type="checkbox"/> Reporting 1. <input checked="" type="checkbox"/> On occasion 2. Weekly 3. Monthly 4. Quarterly 5. Semi-annually 6. Annually 7. Biennially 8. Other (describe)	
17. Statistical methods Does this information collection employ statistical methods? Yes <input checked="" type="checkbox"/> No		18. Agency contact (person who can best answer questions regarding the content of this submission) Name: <u>Mr. David Du Pont</u> Phone: <u>(202) 267-0971</u>	

**Supporting Statement
for
Oil and Hazardous Materials Transfer Procedures**

A. Justification.

- 1) Circumstances that make the collection of information necessary.

The Port and Tanker Safety Act (33 U.S.C. 1221 *et seq.*) authorizes the Coast Guard to develop regulations for equipment, methods, and procedures to prevent discharges of oil and hazardous materials from vessels, onshore facilities, and offshore facilities into the navigable waters of the United States. Consequently, the Coast Guard published oil pollution prevention requirements in 33 CFR Parts 154-156. This collection of information addressed the requirements for vessels in 33 CFR 155.720-820.

This information collection supports the following strategic goals:

Coast Guard

- Protection of the Natural Resources

Marine Safety, Security and Environmental Protection
Directorate (G-M)

- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

- 2) By whom, how, and for what purpose the information is to be used.

Vessel personnel are required to follow the vessel's transfer procedures each time an oil or a hazardous material is transferred to or from the vessel or from tank to tank within the vessel. The purpose is to ensure that proper procedures are followed and to prevent the discharge of oil or hazardous material.

- 3) Consideration of the use of improved information technology.

The information required is particular and unique to each vessel. Due in part to the harsh and hazardous working environment, the regulations require that the transfer procedures be (1) legibly printed and (2) permanently posted or available at a place where the procedures can be easily seen and used by all members of the crew when engaged in transfer operations. Thus, this collection is not amenable

to the use of improved information technology.

- 4) Efforts to identify duplication. Why similar information cannot be used.

There are no State or local regulations relating to this issue. No similar information collection is conducted by other Federal agencies. Similar information does not exist.

- 5) Methods to minimize the burden to small businesses if involved.

Owing to the nature of the industry, recordkeeping requirements for small entities are generally proportionately less. This can be attributed to smaller vessels, simpler transfer systems, and smaller numbers of people involved. The procedures are in a narrative form and no particular format is specified.

- 6) Consequences to the Federal program if collection were conducted less frequently.

If this information were not recorded, vessel personnel would be unfamiliar with the vessel's transfer systems procedures, which might result in the accidental discharge of oil or hazardous materials, fire, or explosion. This information is a one-time requirement and revised whenever the vessels' transfer system is modified. If the information were recorded less frequently, the procedures would become outdated and a hazard to all concerned parties.

- 7) Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

Transfer procedures must be retained for the life of the vessel, because they are used in day-to-day operations. It is estimated that a vessel will average 20 years before its transfer procedures have to be revised or are no longer required.

- 8) Consultation.

This collection is presented for public comment on a triennial basis for public comment. The regulations requiring transfer procedures were developed using the a rulemaking process that followed the APA.

- 9) Explain any decision to provide any payment or gift to respondents.

\$ 3.00	Cost of enlisted review
X 178	Number of plans annually
\$534	Annual cost to the Coast Guard

- 15) Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in vessel population.

- 16) For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

No plans exist for the use of statistical analysis or to publish this information.

- 17) Explain the reasons for seeking not to display the expiration date for OMB approval of the information collection.

Not applicable.

- 18) Explain each exception to the certification statement.

Not applicable.

B. Collection of Information Employing Statistical Methods.

Not applicable.

\$16.00	Clerical wage
X 0.25	Time required to type revisions
\$ 4.00	Clerical cost
\$12.75	Cost per revision (management + clerical)
X 178	Number of annual revisions
\$2,270	Annual cost to revise transfer procedures

13) Estimate of annualized capital and start-up costs.

Not applicable.

14) Estimate of annualized Federal Government costs.

Coast Guard enlisted personnel review transfer procedures during routine vessel boarding. This review takes approximately 9 minutes (0.15 hours) of enlisted time at \$20 per hour. The Coast Guard conducts approximately 38,000 vessel boardings annually. Table 2 presents the annual cost to the Coast Guard for reviewing transfer procedures.

Table 2
Annual Costs to the Coast Guard to Review
Transfer Procedures During Vessel Boarding

\$20.00	Enlisted wage
X 0.15	Time required to review each plan
\$ 3.00	Cost of enlisted review
\$3.00	Cost of enlisted review
X 38,000	Approximate number of vessel boardings/year
\$114,000	Annual costs to the Coast Guard

It is estimated that 178 vessels will revise their transfer procedures each year. Coast Guard enlisted personnel will review these revisions, taking approximately 9 minutes (0.15 hours) per revision at \$20 per hour. Table 3 presents the annual costs to the Coast Guard of reviewing the 178 transfer procedure revisions.

Table 3
Annual Costs to the Coast Guard to Review
Transfer Procedures Revisions

\$20.00	Enlisted wage
X 0.15	Time required to review each plan
\$ 3.00	Cost of enlisted review

\$ 3.00	Cost of enlisted review
X 178	Number of plans annually
\$534	Annual cost to the Coast Guard

- 15) Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a change in vessel population.

- 16) For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

No plans exist for the use of statistical analysis or to publish this information.

- 17) Explain the reasons for seeking not to display the expiration date for OMB approval of the information collection.

Not applicable.

- 18) Explain each exception to the certification statement.

Not applicable.

B. Collection of Information Employing Statistical Methods.

Not applicable.